

EXHIBIT A

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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YONG XIONG HE,

Plaintiff,

**ECF Case
Civil Action No.:
19-CV-05907 (PKC-CLP)**

-against-

CHINA NEW STAR RESTAURANT, INC.,
WAI SHUN CHAN (a/k/a Vincent Chan),
WAI LEUNG CHAN, and
WAI WEN CHAN (a/k/a Daniel Chan),
Defendants.

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INITIAL DISCLOSURE

In accordance with [Rule 26\(a\)\(1\) of the Federal Rules of Civil Procedure](#), Defendants, China New Star Restaurant Inc., Wai Shun Chan, Wai Leung Chan and Wai Wen Chan make the mandatory disclosure as follows:

A. Witnesses who are likely to have discoverable information that the disclosing party may use to support his claims or defenses unless used solely for impeachment.

1. Wai Shun Chan, Defendant.

Mr. Wai Shun Chan has knowledge of the allegations contained in the Complaint and the Answer.

2. Wai Leung Chan, Defendant.

Ms. Wai Leung Chan has knowledge of the allegations contained in the Complaint and the Answer.

3. Wai Wen Chan, Defendant.

Mr. Wai Wen Chan has knowledge of the allegations contained in the Complaint and the Answer.

Defendants reserve the right to supplement the above disclosure with further investigation.

B. Documents

Payroll records (Bates stamp No. 0001-0017) provided on April 3, 2020

Defendants reserve the right to supplement the above disclosure with further investigation.

C. Computation of Damages

Defendant has not claimed any damages in this action. Notwithstanding this fact, Defendants reserve the right to seek attorneys' fees and expenses should they prevail in this action.

D. Insurance Agreements

Defendant has no insurance agreements relevant to this case. Defendants reserve the right to supplement the above disclosure with further investigation.

E. Expert Witnesses

At this point Defendant has not retained any expert.

Defendants reserve the right to supplement the above disclosure with further investigation.

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was furnished via email to Michael L. Winston, Esq. of Gladstein, Reif & Meginniss, LLP, 39 Broadway, Suite 2430, New York, NY 10006 on this 6th Day of June, 2020.

Dated: Queens, New York
June 6, 2020

By: /s/ Yimin Chen
Yimin Chen
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